

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

REC'D TN
REGULATORY AUTH.

Re: Petition of Cinergy Communications)
Company for Arbitration of an)
Interconnection Agreement with BellSouth)
Telecommunications, Inc. pursuant to the)
Telecommunications Act of 1996.

'02 MAY 7 PM 4 08
Docket No. 01-000987

OFFICE OF THE
EXECUTIVE SECRETARY

**OBJECTIONS OF CINERGY COMMUNICATIONS COMPANY TO DATA REQUESTS
OF BELL SOUTH TELECOMMUNICATIONS, INC.**

Cinergy Communications Company ("Cinergy") hereby is providing its objections of the following Data Requests of BellSouth Telecommunications, Inc. filed April 30, 2002.

DATA REQUESTS

13. State your churn rate in Tennessee for customers for whom you provide local service.

ANSWER: Cinergy objects to this question, because the requested material is not relevant to any issue in this proceeding, nor is it likely to lead to the discovery of relevant information. Cinergy further objects because Cinergy maintains no such records and it would be unduly burdensome to create such records.

14. State the number of former Cinergy local service customers in Tennessee that have discontinued service with Cinergy in order to become customers of BellSouth. For any, please identify the name of the customer, the date Cinergy began providing local service to the customer, and the date Cinergy discontinued providing service to the customer.

ANSWER: See Answer to Data Request No. 13 above.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____

Henry Walker

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P.O. Box 198062

Nashville, Tennessee 37219

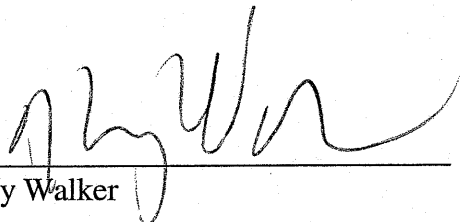
(615) 252-2363

Counsel for Cinergy Communications Company.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 7th day of May, 2002.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300


Henry Walker